

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

L. LIN WOOD, JR.,

Plaintiff,

v.

BRAD RAFFENSPERGER, in his official )  
capacity as Secretary of State of the State )  
of Georgia, REBECCA N. SULLIVAN, )  
in her official capacity as Vice Chair of )  
the Georgia State Election Board, )  
DAVID J. WORLEY, in his official )  
capacity as a Member of the Georgia )  
State Election Board, MATTHEW )  
MASHBURN, in his official capacity as )  
a Member of the Georgia State Election )  
Board, and ANH LE, in her official )  
capacity as a Member of the Georgia )  
State Election Board, )

Defendants.

CIVIL ACTION FILE NO.  
1:20-cv-04651-SDG

**AFFIDAVIT OF KELLY MOORE IN SUPPORT OF**  
**PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER**

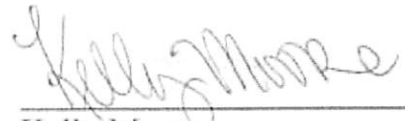
I, Kelly Moore, declare under penalty of perjury that the following is true  
and correct:

1. I am over the age of 18 years and competent to testify herein. I have personal  
knowledge of the matters stated herein.

2. I volunteered to be a monitor for the Donald J. Trump Presidential Campaign, Inc. (the “Trump Campaign”) in connection with what was identified to me as the “hand count” of votes cast in the November 3, 2020 presidential election. I was assigned to monitor the hand count on November 16, 2020 at the Lithonia Voting Facility in Lithonia, Georgia.
3. At the Lithonia location, I was originally scheduled to watch from 1:00 p.m. until 5:00 p.m. I saw irregularities at every table. Every paid auditor was not following procedure. Stacks were being created without regard for the number in the stacks. Stacks of 15 or 16 were being created instead of the required method of creating a stack of ten, and then another stack of ten at right angles on top.
4. There was no system in place that would create an accurate count. When one group left with an “unfinished box,” it was left behind for the next group – at least in once case open and unattended. I watched it to see what would happen, and a poll worker attempted to recover it as a completed box until I called the supervisor.
5. Everyone seemed confident that there would be no change in the counts and did not want to follow any rules set in place. I was confronted with Democrat poll workers and the supervisor, “Twyla” verbally harassed other poll watchers, particularly if she felt they were Republican.

5. From the handful of paper absentee ballots I was able to see up close, it looked like many of the absentee ballots were perfectly filled out, as if the bubbles had been filled in by a machine. But we were kept at such a distance we could not see if they varied in a significant way from the other absentee ballots I observed.

I declare under penalty of perjury that the foregoing statements are true and correct

  
Kelly Moore

STATE OF GEORGIA

COUNTY OF DEKALB

Kelly Moore, appeared before me, a Notary Public in and for the above jurisdiction, this 18<sup>th</sup> day of November 2020, and after being duly sworn, made this Declaration, under oath.

[Affix Seal]



  
Notary Public

My Commission Expires AUGUST 17, 2024